



Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765  
Tel 800 900 9478

EX PARTE OR LATE FILED

REDACTED – FOR PUBLIC INSPECTION

November 17, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Accepted / Filed

NOV 17 2016

Federal Communications Commission  
Office of the Secretary

**RE: Notice of Ex Parte – Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

DOCKET FILE COPY ORIGINAL

Dear Ms. Dortch:

Purple Communications, Inc. (“Purple”), Convo Communications, LLC, CSDVRS, LLC dba ZVRS, and ASL Services, LLC dba GlobalVRS (collectively, the “providers”), pursuant to Sections 0.457 and 0.459 of the Federal Communications Commission’s (FCC or “Commission”) rules, and the Protective Order in the above-captioned proceedings,<sup>1</sup> hereby submit two copies of a redacted version of a notice of ex parte filed on November 17, 2016 in the above-captioned dockets.

All of the information contained after the headings \*\*\***BEGIN**  
**CONFIDENTIAL**\*\*\* and before the close headings \*\*\***END CONFIDENTIAL**\*\*\* is confidential. All material contained inside those headings is proprietary commercial and business information that is not customarily disclosed to the public and is subject to Exemption 4 under the Freedom of Information Act.

No. of Copies rec'd  
List ABCDE

0+1

<sup>1</sup> See 47 C.F.R. §§ 0.457, 0.459; *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 & 03-123, Protective Order, DA 12-404 (2012) (“Protective Order”).



Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765  
Tel 800 900 9478

**REDACTED – FOR PUBLIC INSPECTION**

As this information is submitted voluntarily and absent any requirement by statute, regulation, or the Commission, the providers request that, in the event that the Commission denies the request for confidentiality, the Commission return the materials without consideration of the contents therein.<sup>2</sup>

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker  
Vice President of Regulatory and Strategic Policy  
Purple Communications, Inc.

/s/ Jeff Rosen

Jeff Rosen  
General Counsel  
Convo Communications, LLC

/s/ Gregory Hlibok

Gregory Hlibok  
General Counsel  
CSDVRS, LLC

---

<sup>2</sup> See 47 C.F.R. § 0.459(e).



Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765  
Tel 800 900 9478

**REDACTED – FOR PUBLIC INSPECTION**

/s/ Andrew O. Isar

Andrew O. Isar

Miller Isar, Inc.

Regulatory Consultants to

ASL Services Holdings, LLC dba GlobalVRS





Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765  
Tel 800 900 9478

REDACTED – FOR PUBLIC INSPECTION

November 17, 2016

Accepted / Filed

NOV 17 2016

Federal Communications Commission  
Office of the Secretary

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: Notice of Ex Parte – Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

Dear Ms. Dortch:

On November 15, 2016, Bob Rae, Chief Executive Officer and President, Purple Communications, Inc. (“Purple”), Michael Strecker, Vice President of Regulatory and Strategic Policy, Purple; Jarrod Musano, Chief Executive Officer, Convo Communications, LLC (“Convo”), Jeff Rosen, General Counsel, Convo; Sherri Turpin, Chief Executive Officer, CSDVRS, LLC dba ZVRS, Greg Hlibok, General Counsel, ZVRS; Gabrielle Joseph, Vice President of Operations, ASL Services, LLC dba GlobalVRS, and Andrew Isar, Regulatory Consultant to GlobalVRS<sup>1</sup> (collectively, the “providers”) met with the following staff of the Federal Communications Commission (FCC or “Commission”): Holly Saurer, Legal Advisor, Office of Chairman Wheeler; Amy Bender, Legal Advisor, Office of Commissioner O’Rielly; and Jennifer Thompson, Special Advisor and Confidential Assistant, Office of Commissioner Rosenworcel.

---

<sup>1</sup> Ms. Joseph and Mr. Isar joined the meetings by telephone; all other participants met in person.



Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765  
Tel 800 900 9478

**REDACTED – FOR PUBLIC INSPECTION**

In the meetings, the providers discussed the current competitive conditions in the VRS market, including the continued and potential impact of implementing dramatic VRS rate cuts on competitive providers' viability and ability to compete effectively for market share. Additionally, the providers presented a potential alternative VRS rate structure, of which a copy was provided to staff, that the Commission could consider that would better stabilize the market and address many of those competitive conditions.

The providers also discussed their views on various VRS-related service issues, including skills based routing, deaf interpreters, address book portability, speed of answer, and assigning iTRS phones numbers to hearing individuals who can use sign language to communicate. The providers encouraged the Commission to create a framework to support providers' innovation and implementation of such initiatives, which have the potential to enhance the utility of VRS to deaf and hard of hearing users.

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker  
Vice President of Regulatory and Strategic Policy  
Purple Communications, Inc.

/s/ Jeff Rosen

Jeff Rosen  
General Counsel  
Convo Communications, LLC

# VRS Rate Proposal



# VRS Market Distribution and Estimated Operating Margins

\*\*\*BEGIN CONFIDENTIAL\*\*\*

\*\*\*END CONFIDENTIAL\*\*\*

CONFIDENTIAL

# VRS Market Distribution and Estimated Operating Margins

\*\*\*BEGIN CONFIDENTIAL\*\*\*

\*\*\*END CONFIDENTIAL\*\*\*

CONFIDENTIAL



# 2017 Rate Plan is Not Sustainable

\*\*\*BEGIN CONFIDENTIAL\*\*\*

\*\*\*\*END CONFIDENTIAL\*\*\*\*

- Without competition and an opportunity for providers to earn a reasonable operating margin, the products and services offered to the VRS customers will stagnate with little motivation for the lone remaining provider to innovate and provide high quality service.
- As witnessed in other TRS services, a single provider market could actually result in higher costs to the Fund.

CONFIDENTIAL

# Proposed Rate Structure

\*\*\*BEGIN CONFIDENTIAL\*\*\*

\*\*\*END CONFIDENTIAL\*\*\*  
CONFIDENTIAL

\*\*\*BEGIN CONFIDENTIAL\*\*\*

\*\*\*END CONFIDENTIAL\*\*\*

CONFIDENTIAL



## Benefits of the Proposed 3 Tier Rate Structure

- Improves competition, preserves multiple provider marketplace
- Enables efficient, competitive providers to remain financially viable
- Encourages continued innovation and quality VRS services to the Deaf Community
- Maintains 3-tier structure, while adjusting to market realities: share distribution, scale economies and provider costs
- Better aligns rates with actual provider cost

\*\*\*BEGIN CONFIDENTIAL\*\*\*

\*\*\*END CONFIDENTIAL\*\*\*